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Via ECF

The Honorable Katharine H. Parker, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

USDC SDNY
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APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.

2/12/2025

Re: Ni v. HSBC Bank USA, N.A.
Case No.: 1:23-cv-00309

Dear Judge Parker:

We are counsel to Plaintiff in the above-referenced case. We write, jointly with Defendant, to inform the Court that the parties have agreed to mediation before Eric Paltell on March 11, 2025. To allow the parties to focus on potential resolution, the parties request that the Court stay all discovery deadlines and the February 13, 2025 deadline to object to the Court's Report and Recommendation regarding class certification.

Additionally, the parties request that they report to the Court concerning the outcome of the mediation in a joint letter by March 18, 2025. If the parties are unable to reach a resolution at mediation, the parties propose that they, with their joint letter, submit a new proposed Scheduling Order and briefing schedule for objections to the Report & Recommendation regarding class certification for the Court's approval.

The parties are available to address any concerns Your Honor may have regarding this request at the February 13, 2025 discovery conference. If Your Honor does not have any questions for the parties, the parties request that the discovery conference be adjourned.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.